



June 18, 2020

Carolyn Lozo & Lex Mitchell
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 15-day changes to the Alternative Diesel Fuel Regulation

Dear Ms. Lozo and Mr. Mitchell,

Thank you for providing the opportunity to comment on the proposed amendments to the Alternative Diesel Fuel (ADF) regulation. I write on behalf of World Energy, a global supplier of biofuels, with seven biodiesel production facilities and one sustainable aviation (SAF)/renewable diesel (RD) facility, totaling over 300 million gallons of annual renewable fuel production capacity among its assets. Our SAF/RD facility is located in Paramount, California and is currently being expanded to produce 350 million gallons per year with completion anticipated in 2022. World Energy is one of the most veteran biofuel companies in North America.

World Energy's investments in converting a California petroleum refinery to a renewable fuel production facility are a true LCFS success story. This is the only renewable diesel facility in the state of California that makes 100% renewable fuel. We make high quality, zero-sulfur sustainable aviation fuel, RD and gasoline (naphtha) that is some of the lowest carbon fuel on the planet. In 2018 we announced a \$350 million investment in that facility to grow from 40 million gallons to over 300 million gallons a year. This investment is a direct response to California's LCFS. Once complete, the Paramount facility will be able to meet 10% of California's diesel demand with our renewable diesel, with up to a 76% reduction in emissions.

The company is also a producer of clean, BQ-9000 certified biodiesel for the California market. All of our fuels have undergone years of rigorous testing and regulation to demonstrate the full array of environmental, economic, and other societal benefits.

We support the changes made by CARB staff in response to industry concerns voiced at the April 23rd Board hearing. World Energy is particularly supportive of the single blend ratio that would be applied to the entire industry. Moving the blend ratio from RD75 / B20 to RD55 / B20 will make a material positive impact in our business from the previous proposal.

As we understand it, the triennial review will only assess the possibility of adjusting the blend ratio upwards. A regular review makes sense and will help protect vulnerable communities, and



so we support the scheduled reconsideration. However, we suggest that the triennial review also incorporate any information from lab testing to assess whether the blend ratio is still appropriate, or if it could be adjusted downward.

World Energy is supportive of the proposed package and staff's work on amendments. We see the overall merits in the workshop's changes and urge CARB to move forward with the 15-day amendment package.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Sherbacow", with a long, sweeping underline.

Bryan Sherbacow
Chief Commercial Officer